

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

COLIN SHOLES, *et al.*

Plaintiffs

v.

TORCHLIGHT TECHNOLOGY GROUP LLC,
et al.

Defendants

Civil Action No. 21-1294

MOTION TO DISMISS PLAINTIFFS' COMPLAINT

Pursuant to Federal Rule of Civil Procedure 12(b)(6), Defendants Matthew Morano and Helene Seydoux (“Moving Defendants”), by and through undersigned counsel, respectfully move this Court for an Order dismissing all state law claims in Plaintiffs’ Complaint. The factual and legal support for this Motion are set forth in the accompanying Memorandum of Law, which is incorporated herein by reference.

Moving Defendants request oral argument on this Motion pursuant to Local Rule 7.1(f).

WHEREFORE, Moving Defendants respectfully request this Court enter an Order granting this Motion and dismissing the state law claims in Plaintiffs’ Complaint.

Respectfully submitted,

COZEN O'CONNOR

/s/ Brian Kint

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